PD-0753-20
COURT OF CRIMINAL APPEALS
AUSTIN, TEXAS
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DEANA WILLIAMSON
CLERK

PD-0753-20

FILED
COURT OF CRIMINAL APPEALS
IN THE COURT OF CRIMINAL APPEALS
11/19/2020
DEANA WILLIAMSON, CLERK

OF THE STATE OF TEXAS

♦

BETHANY GRACE MACIEL

Appellant

v.

THE STATE OF TEXAS

Appellee

FIRST MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S BRIEF

TO THE HONORABLE COURT OF CRIMINAL APPEALS:

COMES NOW the Appellant and moves the Court for an extension of time to file the Appellant's Brief, and in support would show the Court as follows:

- (a) The deadline for filing the Appellant's Brief is November 20, 2020.
- (b) The Appellant hereby requests a 30-day extension of time to file the Brief until December 21, 2020.
 - (c) No previous extensions have been granted to file Appellant's Brief.
- (d) Jake Spiegelhauer, attorney for Appellant, is unable to complete the Appellant's Brief by November 20, 2020 due to a steady court docket over the past month and as he has been prepping for jury trial on December 7, 2020 in the case of the State v. Charles Craddock out of the 85th District Court of Brazos County,

Texas involving a defendant who has been incarcerated since January 10, 2020.

WHEREFORE, PREMISES CONSIDERED, the Appellant moves this Court to grant an extension of time to file her Brief until December 21, 2020.

Respectfully submitted,

JAMES, REYNOLDS, & SPIEGELHAUER

BY:

JAKE SPJECELHAUER

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ATTORNEY FOR APPELLANT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing motion was electronically delivered to the County Attorney's Office of Brazos County, Texas and to the State Prosecuting Attorney of Texas on this the 18th day of November, 2020 to:

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Jake Spiegelhauer Bar No. 24085708 jake@jimwjames.com Envelope ID: 48221549

Status as of 11/19/2020 9:39 AM CST

Associated Case Party: Bethany Maciel

Name	BarNumber	Email	TimestampSubmitted	Status
Jake Spiegelhauer		jake@jamesandreynolds.com	11/18/2020 3:22:49 PM	SENT

Associated Case Party: David Higginson

Name	BarNumber	Email	TimestampSubmitted	Status
David Higginson		dhigginson@brazoscountytx.gov	11/18/2020 3:22:49 PM	SENT

Associated Case Party: Stacey Soule

Name	BarNumber	Email	TimestampSubmitted	Status
Stacey Soule		information@spa.texas.gov	11/18/2020 3:22:49 PM	SENT